This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

2/15/2005



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Dirk Kempthorne, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID DOE/ID- /094/ August 2001

SITE 037 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

# DECISION DOCUMENTATION PACKAGE COVER SHEET

#### Prepared in accordance with

# TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Galvanized Metal Trash Can Lid and Empty Stainless Steel Container

located near the former Experimental Field Station (Dairy Farm)

Site ID:

037

Operable Unit:

10-08

Waste Area Group:

10

## I. Summary – Physical Description of the Site:

Site 037 is located 300 ft north of the powerline road near the former Experimental Field Station (Dairy Farm). The Idaho Nuclear Technology Engineering Center (INTEC) is the closest operational facility located approximately 2.5 miles southwest. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description, and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are

The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Investigations revealed that Site 037 consists of one galvanized metal trash can lid and an open, empty stainless steel container (~10 gallon) of unknown use, containing a small centered metal post. Because of close proximity to the former Experimental Field Station (Dairy Farm), it is likely that these items were associated with operations there. When the Dairy Farm was cleaned up extensively in the 1990s, these items may have been inadvertently missed. A radiological survey conducted just prior to the cleanup (September 5, 1991) indicated that radiological conditions present at this site were within background levels. The debris found at the site is estimated to be 20 years old.

There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. There is no evidence of disturbed vegetation, or stained or discolored soil. The ground surface shows well-established native grasses and sagebrush. The description of the site condition is based on recent site investigations; with the exception of the radiological survey, no other field screening or sample data exist for this site.

#### **DECISION RECOMMENDATION**

#### II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. A radiological survey (attached) conducted in September 1991 using field screening instruments indicated that radiological conditions present at this site were within background levels. The reliability of information provided in this report is high. Field investigations, field screening, interviews, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 037 is considered low.

## III. SUMMARY - Consequences of Error:

#### **False Negative Error:**

The possibility of contaminant levels at this site being above risk-based limits is remote. A radiological survey conducted in 1991 indicated that radiological conditions present at this site were within background levels. Field sampling and visual observations of the soil showed no evidence of migration.

#### False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

## IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

## **Recommended Action:**

It is recommended that this newly identified site be classified as No Further Action. A radiological site survey, field investigations, interviews with personnel having historical knowledge of this area, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote, abandoned area with no viable pathways or receptors. The site is located 300 ft north of the powerline road near the Dairy Farm. INTEC is the closest operational facility located approximately 2.5 miles southwest of the site. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants that might pose a potential threat to human health or the environment.

Signatures: Wencla Golden	# Pages: 16 Date: 08/16/01
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:
Approved By: 1/oher 9-30-04	Independent Review: 500 Kew 9-24-09

<b>DECISION</b>	STATEMENT
(DOE	ERPM)

Date Received: 1/14/05

Disposition:

site 037 at the Dairy Farm is classified as no action. This determination will be recorded in the site database and listed in the 2005 INEEL Integrated 5-Your Review.

Date: 1/14/65 # Pages: 10+1

Name: Kathleen Hain Signature: Nathleen E Hain

Name:

DECISION STATEMENT (EPA RPM)  SIK-037	
Date Received:	
Disposition:	
2PA concurs that this ste should	
be classified as a no action	
Site.	
	,
	!
Peter 0 22 0 V	

Signature:

DECISION STATEMENT (IDEQ RPM)
Date Received:
Disposition:
Site 037
Site 037 is some debris located 300 feet north of the powerline road near the former Experimental Field Station and about 2.5 miles northeast of INTEC. The debris includes "one galvanized metal trash can lid and an open, empty stainless steel container (~10 gallon) of unknown use" The debris is estimated to be about 20 years old and to be items that were missed during a general cleanup of the site in the 1990s. A radiological survey conducted in 1991 indicated only background activity levels. There is no visual evidence of hazardous constituents or waste being disposed at this site.
The State recommends No Further Action for this site.
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Date: 44147 /> 244 # Pages:

Signature:

any ( S. Kel

Name:

<b>SITE ID:</b> 037		
	PROCESS:	Galvanized Metal Trash Can Lid and Empty Stainless Steel Container by the former Experimental Field Station (Dairy Farm)
	WASTE:	Industrial Debris Related to Early INEEL Activities
Col 1 Processes W Associated with Pr	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Debris resulting from Tr former INEEL (D ite ex exivities.	Trash can lid and empty steel container related to the Experimental Field Station (Dairy Farm) operations. These two items were likely left behind during an extensive cleanup of the area in the early 1990s.	Artifact: Industrial Debris  Location: Site 037 is located approximately 300 ft north of the powerline road near Experimental Field Station (Dairy Farm). INTEC is located approximately 2.5 miles southwest.  Description: The site consists of one galvanized metal trash can lid and an open, empty stainless steel container (approximately 10 gallon) of unknown use containing a small centered metal post.

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			_	
	Container arm)		Col 9 Overall Reliability (high/med/low)	High High
	Stainless Steel Station (Dairy Fa	tivities	Col 8 Qualitative Risk Assessment (high/med/	Low
Galvanized Metal Trash Can Lid and Empty Stainless Steel Container located near the former Experimental Field Station (Dairy Farm) Industrial Debris Related to Early INEEL Activities	Col 7 Risk-based Concentration	Not Applicable		
	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	None		
	PROCESS:	WASTE:	Col 5 Potential Sources Associated with this Hazardous Material	Soil
CONTAMINANT WORKSHEET	<b>SITE ID:</b> 037		Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	None

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?	
Block 1	Answer:	
Site 037 consists of two items abandoned in place that were likely related to operations at the former INEEL Experimental Field Station (Dairy Farm). The site contains one galvanized metal trash can lid and an open, empty stainless steel container (~10 gallon) containing a small metal centered post. Interviews with Cultural Resource and other INEEL personnel were unable to did not provide a suggested use for this stainless steel container. The site is located approximately 300 ft north of the powerline road near the former Experimental Field Station. INTEC is the closest functioning INEEL facility, located approximately 2.5 miles southwest of the site. The debris found at the site is estimated to be no more than 20 years old.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
Interviews with INEEL Environmental Restoration Environmental Safety and Health (ER ES&H) personnel revealed that the site contains debris likely resulting from activities conducted at the former Experimental Field Station. A radiological site survey revealed that radiological conditions present at this site are within acceptable background levels. There is nothing present at the site that would pose a potential threat to human health or the environment.		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
Interviews were conducted with INEEL ER ES&H and Cultural Resource personnel to determine the nature, age, and type of debris found at the site. Photographs confirm the current condition of the site.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data Disposal Data Disposal Data DATA DATA DATA DATA DATA DATA DATA DAT	

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?		
Block 1	Answer:		
Site 037 consists of one galvanized metal trash can lid and an open, empty stainless steel container (approximately 10 gallon) with a small metal centered post. It is likely that the debris resulted from former Experimental Field Station (Dairy Farm) operations, because of the close proximity. The Dairy Farm was extensively cleaned in the 1990s, however, these items were inadvertently missed during the clean up effort. The site is located 300 ft north of the powerline road near the former Dairy Farm. INTEC is the closest operational facility, located approximately 2.5 miles southwest.			
Block 2	How reliable are the information sources?   High   Med   Low  Explain the reasoning behind this evaluation. (check one)		
Interviews suggest that the materials were likely related to former INEEL Experimental Field Station operations. A radiological survey revealed that radiological conditions were within acceptable background levels. There is no evidence of anything present at the site that would pose a threat to human health or the environment.			
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)		
The information was confirmed through site inspections, a radiological site survey, interviews and photographs.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
No Available Information  Anecdotal  Historical Process Data  Current Process Data  Photographs  Engineering/Site Drawings  Unusual Occurrence Report  Summary Documents  Facility SOPs  Other  Analytical Data  QA Data  Disposal Data  QA Data  D&D Report  Initial Assessment  Well Data  Construction Data			

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.	
Block 1	Answer:	
There is no evidence that a source exists at Site 037. There is no evidence of hazardous constituents, disturbed vegetation, stained or discolored soil, or odors. A radiological survey conducted in September 1991 revealed that the radiological conditions of the site were within acceptable background levels. The site contains one galvanized trash can lid and an open, empty stainless steel container of unknown use. Because of the close proximity to the former Dairy Farm it is likely that the debris was associated with operations conducted there.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
Site investigations revealed that the site contains two items likely related to the former INEEL Experimental Field Station (Dairy Farm). A radiological survey conducted in September 1991 revealed that the radiological condition of the area poses no threat to human health or the environment.		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
Interviews, a radiological survey and site investigations confirm that the artifacts are industrial in nature and likely related to INEEL Dairy Farm activities. Photographs confirm the type of debris and current condition of the site.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data  Disposal Data  QA Data  QA Data  Site Drawings  D&D Report  Currence Report  Currents  Documentation about Data  Disposal Data  QA Data  QA Data  DATE  DAT	

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?		
Block 1	Answer:		
There is no visual evidence of migration at Site 037. Site investigations reveal no visual evidence of hazardous constituents, disturbed, stained or discolored soil areas, or odors. The vegetation surrounding the debris appears to be well established. Neither item contained residual material. It has been determined that the two items were likely related to INEEL Experimental Field Station (Dairy Farm) activities and pose no potential risk to human health or the environment.			
Block 2	How reliable are the information sources?   High   Med   Low  Explain the reasoning behind this evaluation. (check one)		
nature of the	pections, a radiological survey, interviews and photographs of the site suggest the debris, current site conditions showing that the lid and container are empty, and that well established, thereby giving no indication of disturbance or presence of		
Block 3	Has this INFORMATION been confirmed? ☑ Yes ☐ No If so, describe the confirmation. (check one)		
This information was confirmed through site inspections, a 1994 environmental baseline assessment, a radiological survey, interviews and photographs.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
	2, 5 Documentation about Data  Disposal Data  QA Data  QA Data  S Safety Analysis Report  Site Drawings  Unitial Assessment  Well Data		

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?	
Block 1	Answer:	
There is no expected pattern of potential contamination because there is no visual evidence of hazardous substances at the site. There is no evidence of stained or discolored soil, odors or evidence of disturbed vegetation. The debris was determined to be industrial in nature and likely related to INEEL Dairy Farm activities. A radiological survey (#130924) conducted September 5, 1991 with field screening instruments indicated that radiological conditions present at Site 037 were within background levels. The groundcover surrounding the debris reflects well established vegetation.		
Block 2	How reliable are the information sources?   High   Med   Low   Explain the reasoning behind this evaluation. (check one)	
This information was obtained from a 1994 environmental baseline assessment, site investigation, and radiological survey suggesting the nature and age of the artifacts; photographs confirmed the evidence of the debris and site conditions.		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through a radiological survey, site inspection, interviews, and photographs.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data  ocess Data Disposal Data QA Data S Safety Analysis Report Site Drawings D&D Report Currence Report Disposal Data DATE DATE DATE DATE DATE DATE DATE DATE	

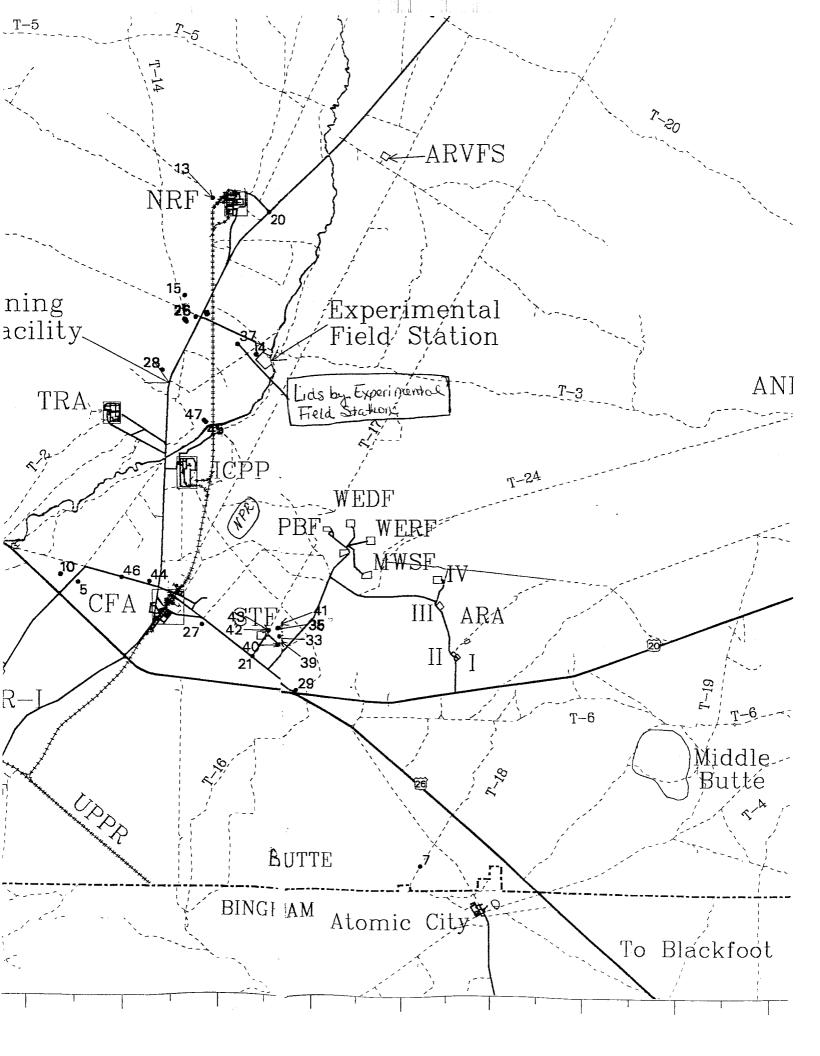
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.	
Block 1	Answer:	
Site investigations and photographs indicate that Site 037 consists of two items in an area ~4 ft long by 2 ft wide. One galvanized metal trash can lid and an open, empty stainless steel container (approximately 10 gallon) of unknown use containing a small metal centered post. Because of the proximity to the former INEEL Experimental Field Station (Dairy Farm), it is likely that these items were associated with activities conducted there. The Dairy Farm was extensively cleaned in the 1990s, however, it appears that the lid and container were missed during the clean up. There is no evidence of a source at this site or contaminated region to estimate because there is no evidence of hazardous or radioactive materials.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
a subsequent revealed that	on was obtained from an environmental baseline assessment conducted in 1994, and radiological site survey and investigation conducted by INEEL personnel. The survey the radiological conditions present at the site were within background levels. of the area show that the vegetation is well established.	
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through a radiological survey, site inspection, interviews, and photographs.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data Disposal Data	

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.			
Block 1	Answer:			
The estimated quantity of hazardous substances/constituents at this site is near zero, because there is no evidence of any hazardous or radioactive materials present at Site 037. The site contains debris that likely resulted from early INEEL Experimental Field Station (Dairy Farm) activities. The Dairy Farm was cleaned up extensively in the 1990s, however the items found at the site were inadvertently missed. In September of 1991 a radiological site survey was conducted using field screening instruments. The survey revealed that the radiological conditions present at the site were within acceptable background levels. No residuals were found in either item.				
Block 2 How reliable are the information sources?   High   Med   Low  Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment, a site investigation, radiological survey and photographs. Photographs of the site show well-established vegetation, giving no indication of disturbance or presence of hazardous constituents.				
Block 3	Block 3 Has this INFORMATION been confirmed?   Yes  No (check one)			
This has been confirmed through a radiological site survey, a site inspection, interviews, and photographs.				
Block 4	Block 4 Sources of Information (check appropriate box(es) & source number from reference list)			
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Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.			
Block 1	Answer:			
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. A radiological site survey conducted in September 1991 revealed that the radiological conditions present at Site 037 were within acceptable background levels. There is no evidence of stained or discolored soil, disturbed vegetation, or odors. The garbage can lid and stainless container are empty.				
Block 2 How reliable are the information sources?   High Med Low Explain the reasoning behind this evaluation. (check one)				
This evaluation is based on a radiological site survey, a site inspection, interviews and photographs of the site. The site shows no soil staining, and the vegetation around the debris appears to be well established. There is no evidence of hazardous substances or constituents.				
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)			
This has been confirmed through a radiological survey, visual site inspections, interviews and photographs of the area showing that vegetation is well established, and no staining or odor is evident.				
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)			
Anecdotal Historical Procurrent Proc Photograph Engineering	Cess Data  QA Data  S			

#### **REFERENCES**

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photograph of Site 037: PN99-465-1-16.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.
- 6. INEEL Radiological Control Survey Form for the Dairy Farm, September 5, 1991.



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# Attachment A

Photograph of Site #37



Site: 037 Lid and Stainless Steel Container by Experimental Field Station (dairy Farm) (99-465-1-16)

# **Attachment B**

**Supporting Information for Site #037** 

435.36 04/14/99 Rev. 03

# **NEW SITE IDENTIFICATION**

Par	Part A – To Be Completed By Observer				
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877			
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324			
2.	Site Title: 037, Lids by Experimental Field Station				
3.	Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.  Two lids are located 300 ft. north of the powerline road near the experimental dairy farm. During the July 1999 site visit, a				
	galvanized metal trash can lid and an unknown stainless steel container was obs . The reference number for this site is 037 and can be				
Par	B - To Be Completed By Contractor WAG Manager				
4.	Recommendation:				
	This site meets the requirements for an inactive waste site, requires investigated FFA/CO Action Plan. Proposed Operable Unit assignment is recommended WAG:  Operable United States of the Communication of the Communicat	to be included in the FFA/CO.			
	This site DOES NOT meet the requirements for an inactive waste site, DOES included in the INEEL FFA/CO Action Plan.	S NOT require investigation and SHOULD NOT be			
5.	Basis for the recommendation:				
	The conditions that exist at this site indicate the potential for an inactive waste sit or Disturbance of Suspected Inactive Waste Sites.	e according to Section 2 of MCP-3448 Reporting			
	The basis for recommendation must include: (1) source description; (2) exposur concern; and (4) descriptions of interfaces with other programs, as applicable (e.g.	e pathways; (3) potential contaminants of g., D&D, Facility Operations, etc.)			
6.	Contractor WAG Manager Certification: I have examined the proposed site and to believe the information to be true, accurate, and complete. My recommendation				
Nan	se:Signature:	Date:			

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